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COMMONWEALTH OF PUERTO RICO PUBLIC SERVICE REGULATORY BOARD PUERTO RICO ENERGY BUREAU

IN RE: REVIEW OF LUMA'S INITIAL BUDGETS

CASE NO. NEPR-MI-2021-0004

SUBJECT: Request for Extension of Time to Submit Responses to Specific Requests for Information Issued on May 19, 2022

REQUEST FOR EXTENSION OF TIME TO SUBMIT RESPONSES TO SPECIFIC REQUESTS FOR INFORMATION ISSUED ON MAY 19, 2022

TO THE HONORABLE PUERTO RICO ENERGY BUREAU:

COME NOW LUMA Energy, LLC ("ManagementCo"), and LUMA Energy ServCo, LLC ("ServCo"), (jointly referred to as "LUMA"), and respectfully state and request the following:

- 1. On May 19, 2022, this honorable Bureau entered a Resolution and Order ("May 19 Order") as part of which it issued 116 requirements of information ("ROIs") including subparts directed to LUMA and established a procedural schedule in this proceeding.
- 2. The ROIs were detailed in Attachments A through F to the May 19 Order and seek information related to a variety of topics including the Proposed Fiscal Year 2023 Annual Budget; certain Resolutions and Orders entered by this honorable Bureau throughout this proceeding; LUMA's Fiscal Year 2022 Q1 Report filed on November 15, 2021; LUMA's Fiscal Year 2022 Q2 Report filed on February 15, 2022; the Proposed Fiscal Year 2023 Generation Budget and the Fiscal Year 2022 Generation Maintenance Approved Budget. See Attachments A through F of the May 19 Order.
 - 3. As per the May 19 Order, the responses to the ROIs are due tomorrow.

- 4. Upon reviewing the ROIs, LUMA noticed that multiple of the requests require input from the Puerto Rico Electric Power Authority ("PREPA") because they refer to matters handled by PREPA. To that end, LUMA contacted PREPA's representatives and requested PREPA's responses to the following requests: A7, A8, A9, F1, F2, F3(A)-(C), F4, F5(A)-(E), F6(A)-(E), F7, F8, F9(A) and F10(A)-(D). LUMA also diligently began working on its responses to the rest of the ROIs.
- 5. Despite its efforts, LUMA requires a brief extension of time, until June 7, 2022, to allow for enough time to collect all the information necessary to respond, finalize, and submit the responses to the following ROIs: D1, D2, D14, E18, E19, and F10.
- 6. PREPA also informed LUMA that it requires an extension, until June 7, to finalize and notify LUMA of its responses to the remaining requests requiring PREPA's input, so that LUMA is in position to submit them to this Bureau. Specifically, those requests requiring an extension include: F1, F2, F3(A)-(C), F4, F5(A)-(E), F6(A)-(E), F7, F8, F9(A), and F10(A)-(D),
- 7. In light of the above, LUMA respectfully requests that this honorable Bureau grant LUMA and PREPA a brief extension of time until June 7, 2022 to finalize the responses to the requests mentioned above.
- 8. It is respectfully informed that the request for extension is made in good faith with the only purpose of putting LUMA and PREPA in position of fully complying with responding to the totality of the ROI's which, as mentioned, amounted to 116 requests (including subparts) and required the coordination of a joint effort.

WHEREFORE, LUMA respectfully requests this Honorable Bureau to **take notice** of the foregoing for all relevant purposes and **grant** a brief extension of time, until June 7, 2022 for the submission of the rest of the responses as detailed herein.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 2nd day of June 2022.

I hereby certify that I filed this motion using the electronic filing system of this Energy Bureau and that I will send an electronic copy of this motion to the attorneys for PREPA, Joannely Marrero-Cruz, jmarrero@diazvaz.law; and Katiuska Bolaños-Lugo, kbolanos@diazvaz.law.



DLA Piper (Puerto Rico) LLC

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